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April 20, 2018

**VIA E-FILING**

The Honorable Madeline Cox Arleo, U.S.D.J.  
United States District Court for the District of  
New Jersey  
Martin Luther King, Jr. Bldg. & U.S.  
Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

**Re: *White et al. v. LG Electronics, Inc. et al.,*  
U.S.D.C. for the District of New Jersey, Case No. 17-CV-01775**

Dear Judge Arleo:

Please find attached for filing a Joint Stipulation and Proposed Consent Order on behalf of all parties. This filing will replace the Joint Stipulation and Proposed Consent Order previously filed on April 18, 2018. [DE #68].

By way of background, Plaintiffs instituted the above-referenced action on March 16, 2017 against multiple defendants (the “Initial Complaint”), and filed an amended complaint on January 17, 2018 (the “Amended Complaint”). Of the named defendants, Plaintiffs served the Initial Complaint and Amended Complaint on Defendants LG Electronics U.S.A., Inc., Samsung Electronics America, Inc., and Sony Electronics Inc. (collectively, the “U.S. Defendants”). Plaintiffs did not serve the Initial Complaint or the Amended Complaint on Defendants LG Electronics, Inc., Samsung Electronics Co., Ltd., and Sony Corporation (collectively the “Foreign Parent Companies”). The U.S. Defendants have filed a motion to dismiss the Amended Complaint [D.E. #54], which is currently pending with the Court.

Plaintiffs have consented to dismissing the above-referenced action as to the Foreign Parent Companies and to having the names of the Foreign Parent Companies struck from the caption. Consistent with discussions between the parties and Magistrate Judge Mannion’s Chambers, the parties have prepared the attached Joint Stipulation and Proposed Consent Order.

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The parties respectfully request that Your Honor so-order the attached Joint Stipulation and Proposed Consent Order.

Respectfully submitted,



Mark S. Melodia

Enclosure

cc: All Attorneys of Record (via e-filing)